



December 5, 2016

Via ECF

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
P.O. Box 9014
Central Islip, NY 11722

Re: ***Yucel Edebali v. Bankers Standard Insurance Company***
Case No. 14 CV 7095 (JS) (AKT)

Judge Tomlinson:

Our office represents the Defendant, Bankers Standard Insurance Company ("Bankers Standard"), in the above-referenced matter. Pursuant to Individual Practice Rule III.C.1.b, we write to request approval of a briefing schedule related to a motion to quash subpoenas served on Brian Gibbons, Esq. by Plaintiff, Yucel Edebali. The parties conducted a telephone conference to discuss Bankers Standard's issues with the subpoenas, but were unable to resolve their differences. As Bankers Standard intends to proceed with a motion to quash, the parties have agreed on the following briefing schedule for the Court's approval:

- Defendant's motion papers must be served by December 21, 2016;
- Plaintiff's opposition must be served by January 23, 2017; and
- Defendant's reply papers must be served by February 1, 2017.

If you have any questions, please let us know.

Respectfully Submitted,

Foran Glennon Palandech Ponzi & Rudloff PC

By:

A handwritten signature in blue ink, appearing to be "V. Yoo".

Venice Yoo (VY4135)

cc: Scott E. Agulnick – via ECF

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